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Legitimization of Bastards.—A man abandoned his wife and children in New York, married again without obtaining a divorce, eventually moved to Michigan, instituted divorce proceedings against his lawful wife by publication, notice of which she did not receive, was thereupon awarded a decree of divorce, and remarried the second wife, by whom he had had two children. The remainder of an estate of which the father had been life tenant was to vest in his "lawful issue." By the Michigan law the intermarriage of parents legitimizes their offspring. The New York Court of Appeals in *Olmsted v. Olmsted*, 83 Northeastern Reporter, 569, held that, as the Michigan court had never acquired jurisdiction of the person of the first wife, its decree of divorce was not a judgment which it was bound to respect, and that the subsequent marriage was invalid, and did not legitimize the issue of the second wife.

Proximate Cause.—Plaintiff had agreed to maintain fences about his premises along defendant's railroad track. A cow escaped through a defect in the fence, and was struck by defendant's engine. In *Southern Ry. Co. v. Dickens*, 45 Southern Reporter, 215, an action for the death of the animal, defendant contended that the failure to keep up the fence proximately contributed to plaintiff's damage, which contention the Supreme Court of Alabama refused to sustain.

Action against Husband by Wife.—The report of the case of *Copp v. Copp*, 68 Atlantic Reporter, 458, decided by the Supreme Judicial Court of Maine, discloses an attempt on the part of a wife to collect from her husband on a claim for labor as cook in his logging camp. Plaintiff also sought to establish a lien on certain logs. The court held that no judgment could be obtained by a wife against her husband, and sustained a demurrer to the declaration.

Compliance with Condition of Insurance Policy by Mortgagee.—In the case of *Union Inst. for Savings v. Phoenix Ins. Co.*, 81 Northeastern Reporter, 994, a policy of insurance was issued to a mortgagee containing a clause for payment of loss to the mortgagee as its interest may appear. Another provision related to notice of loss and arbitration. The Supreme Judicial Court of Massachusetts held that the primary duty rested upon the mortgagor, but that on his failure to take action the mortgagee might do so, and that compliance by one or the other was necessary before an action could be brought.

Distinguishing Marks on Election Ballots.—The statutes of Tennessee provide that in all elections ballots shall be of certain dimensions, and that, if any picture, sign, mark, etc., is placed thereon, the ballots shall not be counted. In *Cross v. Keathley*, 105 Southwestern